



LT Environmental, Inc.

4600 West 50th Avenue  
Arvada, Colorado 80007  
303.433.6786

October 10, 2018

United States Environmental Protection Agency Region 8  
Director, Air and Toxics Technical Enforcement Program  
Office of Enforcement, Compliance, and Environmental Justice  
Mail Code 8ENF-AT  
1595 Wynkoop Street  
Denver, Colorado 80202-1129

**RECEIVED**

**OCT 31 2018**

Office of Enforcement, Compliance  
and Environmental Justice

**RE: NSPS Subpart OOOOa Annual Report  
Hamill 19-16HA Production Facility  
Myers 19-11HA Production Facility  
GRMR Oil and Gas, LLC**

To Whom It May Concern:

On behalf of GRMR Oil and Gas, LLC (GRMR), LT Environmental, Inc. (LTE) is submitting the attached annual report in accordance with 40 Code of Federal Regulations (CFR) New Source Performance Standard (NSPS) Subpart OOOOa. This report covers the August 2, 2017, through August 1, 2018, reporting period for the Hamill 19-16HA and the Myers 19-11HA Production Facilities. Attachment 1 includes the appropriate portions of the EPA provided reporting template, and the signed certification of completeness by a responsible official is in Attachment 2.

Please do not hesitate to contact me at (303) 962-5537 or [gfast@ltenv.com](mailto:gfast@ltenv.com) if you have any questions or require additional information.

Sincerely,

LT ENVIRONMENTAL, INC.

(b) (6)

Ginger Fast  
Project Air Quality Scientist

cc: Mr. Mike Griffis — GRMR Oil and Gas, LLC (electronic file)

Attachments:

Attachment 1 NSPS OOOOa Annual Report  
Attachment 2 Certification by Responsible Official





## ATTACHMENT 1: NSPS 0000a ANNUAL REPORT

40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 - 60.5420a(b) Annual Report  
For each affected facility, an owner or operator must include the information specified in paragraphs (b)(1)(i) through (iv) of this section in all annual reports:

The asterisk (\*) next to each field indicates that the corresponding field is required.

SITE INFORMATION

Facility Record No. * (Field value will automatically generate if a value is not entered.)	Company Name * (\$60.5420a(b)(1)(i))	Facility Site Name * (\$60.5420a(b)(1)(i))	US Well ID or US Well ID Associated with the Affected Facility, if applicable. * (\$60.5420a(b)(1)(i))	Address of Affected Facility * (\$60.5420a(b)(1)(i))	Address 2	City *	County *	State Abbreviation *	Zip Code *	Responsible Agency Facility ID (State Facility Identifier)
e.g.: ABC Company      e.g.: XYZ Compressor Station      e.g.: 12-345-67890-12      e.g.: 123 Main Street      e.g.: Suite 100      e.g.: Brooklyn      e.g.: Kings County      e.g.: NY      e.g.: 11221										
1	GRMR Oil & Gas, LLC	Myers 19-11HA Production Facility	05-081-07818	N/A	N/A	N/A	Moffat	CO	81638	081/0555
2	GRMR Oil & Gas, LLC	Hamill 19-16HA Production Facility	05-081-07822	N/A	N/A	N/A	Moffat	CO	81638	081/0558

sort

ALTERNATIVE ADDRESS INFORMATION (IF NO PHYSICAL ADDRESS AVAILABLE FOR SITE *)			REPORTING INFORMATION		PE Certification	ADDITIONAL INFORMATION	
Description of Site Location (\$60.5420a(b)(1)(i))	Latitude of the Site (decimal degrees to 5 decimals using the North American Datum of 1983) (\$60.5420a(b)(1)(i))	Longitude of the Site (decimal degrees to 5 decimals using the North American Datum of 1983) (\$60.5420a(b)(1)(i))	Beginning Date of Reporting Period.* (\$60.5420a(b)(1)(iii))	Ending Date of Reporting Period.* (\$60.5420a(b)(1)(iii))	Please provide the file name that contains the certification signed by a qualified professional engineer for each closed vent system routing to a control device or process. * (\$60.5420a(b)(12)) Please provide only one file per record.	Please enter any additional information.	Enter associated file name reference.
e.g.: 7 miles NE of the intersection of Hwy 123 and Hwy 456	e.g.: 34.12345	e.g.: -101.12345	e.g.: 01/01/2016	e.g.: 06/30/2016	e.g.: Certification.pdf or XYZCompressorStation.pdf		e.g.: addlinfo.zip or XYZCompressorStation .pdf
From the intersection of Hwy 13 and Hwy 317, go 4.6 miles east on CO-317, then turn right and go 0.1 mile to facility.	(b) (9)		8/2/2017	8/1/2018		N/A	
From the intersection of Hwy 13 and Hwy 317, go 5.1 miles east on CO-317, then turn right and go 0.47 miles on CO-37, then turn right and go 1.1 mile on lease road to facility.			8/2/2017	8/1/2018		N/A	

40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 - 60.5420a(b) Annual Report

For each storage vessel affected facility, an owner or operator must include the information specified in paragraphs (b)(8)(i) through (vi) of this section in all annual reports:

The asterisk (\*) next to each field indicates that the corresponding field is required.

Facility Record No. * (Select from dropdown list - may need to scroll up)	Storage Vessel ID * (§60.5420a(b)(1)(i)) and §60.5420a(b)(6)(ii)	Was the storage vessel constructed, modified or reconstructed during the reporting period? * (§60.5420a(b)(5)(i))	Latitude of Storage Vessel (Decimal Degrees to 5 Decimals Using the North American Datum of 1983) * (§60.5420a(b)(4)(i))	Longitude of Storage Vessel (Decimal Degrees to 5 Decimals Using the North American Datum of 1983) * (§60.5420a(b)(4)(ii))	If new affected facility or if returned to service during the reporting period, provide documentation of the VOC emission rate determination according to §60.5365(a). * (§60.5420a(b)(6)(i))	Records of deviations where the storage vessel was not operated in compliance with requirements * (§60.5420a(b)(6)(ii) and §60.5420a(c)(5)(ii))	Have you met the requirements specified in §60.5410a(h)(2) and (3)? * (§60.5420a(b)(6)(iv))	Removed from service during the reporting period? * (§60.5420a(b)(6)(v))	If removed from service, the date removed from service * (§60.5420a(b)(6)(v))	Returned to service during the reporting period? * (§60.5420a(b)(6)(vi))	If returned to service, the date returned to service * (§60.5420a(b)(6)(vi))
e.g.: Tank 125	e.g.: modified	e.g.: 34.12345	e.g.: -101.12345	e.g.: VOC emission rate is 6.5 tpy. See file rate_determination.pdf for more information.	e.g.: On October 12, 2016, the pilot flame was not functioning on the combustion unit controlling the storage vessel.	e.g.: Yes	e.g.: Yes	e.g.: 11/15/16	e.g.: Yes	e.g.: 11/15/16	
2	Tank 1	*No	(b) (9)		N/A	N/A	Yes	No	N/A	N/A	N/A
2	Tank 2	No			N/A	N/A	Yes	No	N/A	N/A	N/A
2	Tank 3	No			N/A	N/A	Yes	No	N/A	N/A	N/A



Storage Vessel Constructed, Modified, Reconstructed or Returned to Service During Reporting Period that Comply with §60.539(a)(2) with a Control Device Tested Under § 60.541(a)(d)												
Make of Purchased Device * (§60.5420a(h)(8)(vii) and §60.5420a(c)(5)(v)(IA))	Model of Purchased Device * (§60.5420a(b)(6)(vi) and §60.5420a(c)(5)(v)(IA))	Serial Number of Purchased Device * (§60.5420a(b)(6)(vi) and §60.5420a(c)(5)(v)(IA))	Date of Purchase * (§60.5420a(b)(6)(vi) and §60.5420a(c)(5)(v)(IB))	Copy of Purchase Order (§60.5420a(b)(6)(vi) and §60.5420a(c)(5)(v)(IC))	Latitude of Control Device (Decimal Degrees to 5 Decimals Using the North American Datum of 1983) * (§60.5420a(b)(6)(vi) and §60.5420a(c)(5)(v)(ID))	Longitude of Control Device (Decimal Degrees to 5 Decimals Using the North American Datum of 1983) * (§60.5420a(b)(6)(vi) and §60.5420a(c)(5)(v)(ID))	Inlet Gas Flow Rate * (§60.5420a(b)(8)(vi) and §60.5420a(c)(5)(v)(IE))	Please provide the file name that contains the Records of Pilot Flame Present at All Times of Operation * (§60.5420a(c)(5)(v)(F)(I) & §60.5420a(c)(5)(v)(F)(II)) Please provide only one file per record.	Please provide the file name that contains the Records of No Visible Emissions Periods Greater Than 1 Minute During Any 15 Minute Period * (§60.5420a(b)(6)(vi) and §60.5420a(c)(5)(v)(F)(II)) Please provide only one file per record.	Please provide the file name that contains the Records of Maintenance and Repair Log * (§60.5420a(b)(6)(vi) and §60.5420a(c)(5)(v)(F)(III)) Please provide only one file per record.	Please provide the file name that contains the Records of Visible Emissions Test Following Return to Operation From Maintenance/Repair Activity * (§60.5420a(b)(6)(vi) and §60.5420a(c)(5)(v)(F)(IV)) Please provide only one file per record.	Please provide the file name that contains the Records of Manufacturer's Written Operating Instructions, Procedures and Maintenance Schedule * (§60.5420a(b)(6)(vi) and §60.5420a(c)(5)(v)(F)(V)) Please provide only one file per record.
e.g.: Incinerator Guy	e.g.: 400 Combustor	e.g.: 123889992	e.g.: 12/10/16	e.g.: purchase_order.pdf or XYZCompressorStation.pdf	e.g.: 34.12340	e.g.: 101.12340	e.g.: 3000 scfh	e.g.: pilotflame.pdf or XYZCompressorStation.pdf	e.g.: noemissions.pdf or XYZCompressorStation.pdf	e.g.: maintainlog.pdf or XYZCompressorStation.pdf	e.g.: emtest.pdf or XYZCompressorStation.pdf	e.g.: manufact.pdf or XYZCompressorStation.pdf
N/A	N/A	N/A	N/A	N/A	(b) (9)		N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A			N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A			N/A	N/A	N/A	N/A	N/A	N/A

40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 - 60.5420a(b) Annual Report

For the collection of fugitive emissions components at each well site and the collection of fugitive emissions components at each compressor station within the company-defined area, an owner or operator must include the records of each monitoring survey including the information specified in paragraphs (b)(7)(i) through (xii) of this section in all annual reports:

The asterisk (\*) next to each field indicates that the corresponding field is required.

Facility Record No. * (Select from dropdown list - may need to scroll up)	Identification of Each Affected Facility * (\$60.5420a(b)(1))	Date of Survey * (\$60.5420a(b)(7)(i))	Survey Begin Time * (\$60.5420a(b)(7)(ii))	Survey End Time * (\$60.5420a(b)(7)(iii))	Name of Surveyor * (\$60.5420a(b)(7)(iv))	Ambient Temperature During Survey * (\$60.5420a(b)(7)(v))	Sky Conditions During Survey * (\$60.5420a(b)(7)(vi))	Maximum Wind Speed During Survey * (\$60.5420a(b)(7)(vii))	Monitoring Instrument Used * (\$60.5420a(b)(7)(viii))	Deviations From Monitoring Plan (If none, state none.) * (\$60.5420a(b)(7)(ix))	Type of Component for which Fugitive Emissions Detected * (\$60.5420a(b)(7)(x))	Number of Each Component Type for which Fugitive Emissions Detected * (\$60.5420a(b)(7)(xi))	Type of Component Not Repaired as Required in §60.5397a(h) * (\$60.5420a(b)(7)(xii))	Number of Each Component Type Not Repaired as Required in §60.5397a(h) * (\$60.5420a(b)(7)(xiii))
	e.g.: Well Site ABC	e.g.: 8/13/17	e.g.: 10:00 am	e.g.: 1:00 pm	e.g.: John Smith	e.g.: 90°F	e.g.: Sunny, no clouds	e.g.: 2 mph	e.g.: Company ABC optical gas imaging camera	e.g.: None	e.g.: Valve	e.g.: 3	e.g.: Valve	e.g.: 1
1	Myers 19-13HA Production Facility	10/18/2017	8:00 AM	8:15 AM	(b) (6)	25°F	Clear	5 mph	FLIR GF320 Optical Gas Imaging (OGI) Camera	None	None	0	N/A	N/A
1	Myers 19-13HA Production Facility	1/30/2018	10:07 AM	10:23 AM		45°F	Clear	5 mph	FLIR GF320 Optical Gas Imaging (OGI) Camera	None	Pressure Regulator	1	N/A	N/A
2	Hamill 19-16HA Production Facility	10/18/2017	9:05 AM	9:20 AM		33°F	Clear	3 mph	FLIR GF320 Optical Gas Imaging (OGI) Camera	None	None	0	N/A	N/A
2	Hamill 19-16HA Production Facility	4/21/2018	11:20 AM	11:55 AM		62°F	Clear	5 mph	FLIR GF320 Optical Gas Imaging (OGI) Camera	None	None	0	N/A	N/A

Type of Difficult-to-Monitor Components Monitored *	Number of Each Difficult-to-Monitor Component Type Monitored *	Type of Unsafe-to-Monitor Component Monitored *	Number of Each Unsafe-to-Monitor Component Type Monitored *	Date of Successful Repair of Fugitive Emissions Component *	Type of Component Placed on Delay of Repair *	Number of Each Component Type Placed on Delay of Repair *	Explanation for Delay of Repair *	Type of Instrument Used to Resurvey Repaired Components Not Repaired During Original Survey *	OGI	Compressor Station Affected Facility Only	
									Training and Experience of Surveyor *	Was a monitoring survey waived under § 60.5397a(g)(5)? *	If a monitoring survey was waived, the calendar months that make up the quarterly monitoring period for which the monitoring survey was waived. *
e.g.: Valve	e.g.: 1	e.g.: Valve	e.g.: 1	e.g.: 11/10/16	e.g.: Valve	e.g.: 1	e.g.: Unsafe to repair until next shutdown	e.g.: Company ABC optical gas imaging camera	e.g.: Trained thermographer; completed 40-hour course at XYZ Training Center. Has 10 years of experience with OGI surveys.	e.g.: Yes	e.g.: January, February, and March
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Infrared Training Center OGI certification in March 2016; 2.5 years of survey experience	N/A	N/A
N/A	N/A	N/A	N/A	4/2/2018	N/A	N/A	N/A	Method 21 Section 8.3.3 screening procedure	Infrared Training Center OGI certification in March 2017; 1.5 years of survey experience	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Infrared Training Center OGI certification in March 2016; 2.5 years of survey experience	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Infrared Training Center OGI certification in March 2017; 1.5 years of survey experience	N/A	N/A





## ATTACHMENT 2: CERTIFICATION BY RESPONSIBLE OFFICIAL

**Responsible Official**

Name: (Last) Griffis (First) Mike (MI) \_\_\_\_\_

Title Operations Manager

Street or P.O. Box P.O. Box 6280

City Broomfield State CO ZIP 80021

Telephone (303) 819 - 7354 Ext. \_\_\_\_\_ Facsimile (\_\_\_\_) \_\_\_\_\_ - \_\_\_\_\_

**Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)**

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) \_\_\_\_\_  
(b) (6)

Name (typed) Mike Griffis Date: Oct / 24 / 2018